

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

EIGHT MILE STYLE, LLC; MARTIN  
AFFILIATED, LLC,

Plaintiffs,

vs.

SPOTIFY USA INC.; HARRY FOX  
AGENCY, LLC,

Defendants.

vs.

KOBALT MUSIC PUBLISHING AMERICA,  
INC.,

Third-Party Defendant.

**Case No. 3:19-cv-00736**

**District Judge Aleta A. Trauger**

**JURY DEMAND**

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**JOINT STIPULATION FOR ENTRY OF EIGHTH AMENDED PROPOSED INITIAL  
CASE MANAGEMENT ORDER**

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Pursuant to LR 16.01, the Plaintiffs Eight Mile Style, LLC and Martin Affiliated, LLC, Defendants Spotify USA Inc. and Harry Fox Agency, LLC, and Third-Party Defendant Kobalt Music Publishing America, Inc. (collectively, the “Parties”) submit the following attached Eighth Amended Proposed Initial Case Management Order. This Eighth Amended Proposed Initial Case Management Order would supersede the Initial Case Management Order entered on September 30, 2021 (Doc. No. 202). The Parties propose extending the dates contained in the Initial Case Management Order to those listed within the attached Proposed Case Management Order to allow additional time for the Parties to complete fact and expert discovery and dispositive motions

practice following the completion of liability discovery. In support of this Joint Stipulation, the Parties would show to the Court that:

- The Parties have been working jointly in good faith to complete fact witness depositions and written discovery prior to the deadline set forth in the operative Seventh Amended Initial Case Management Order (Doc. No. 202).
- The Parties have complied with the substantial completion deadline for exchange of documents and electronically stored information.
- The Parties have conducted the depositions of ten fact and 30(b)(6) witnesses, often involving multiple days of testimony for a given deponent for a total of thirteen days of testimony. Further, the parties have scheduled ten more depositions, and are exchanging dates for the remaining fact and 30(b)(6) witnesses.
- The Parties are continually working to schedule the remaining fact and 30(b)(6) witnesses, but given the holiday schedules, the scheduling obligations of the witnesses, and preexisting obligations of counsel, the Parties cannot complete the remaining depositions prior to the current close of fact discovery.
- The Parties believe in good faith that the deadlines proposed in the attached Eighth Proposed Initial Case Management Order will give sufficient time to complete the remaining fact witness depositions, written discovery, and expert discovery, such that they will not need to petition the Court for further extensions.

Therefore, the Parties respectfully request the Court enter the attached Eighth Amended Proposed Initial Case Management Order.

Respectfully Submitted,

Dated: December 1, 2021

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## **CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing was filed electronically on December 1, 2021 with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to all parties and counsel of record by operation of the Court's CM/ECF system.

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